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June 6, 2021

VIA E-FILE

Honorable Michael A. Hammer, U.S.M.J.
United States District Court for the District of New Jersey
Newark Vicinage Martin Luther King Building & US Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Rosa Acosta vs. Infinity Lounge, Faraones Nightclub
Case No.: 2:18-CV-17710-MCA-MAH

Dear Judge Hammer:

This office represents Defendants, Faraones Nightclub and Infinity Lounge. Paper discovery is complete, but the parties need to complete party and fact witness depositions and expert discovery. In addition, I have learned through Third-Party Defendant Mayan Mobile Marketing that additional parties, Javier Martinez and Moregraphix, should be included in this matter as Third-Party Defendants. These parties were also responsible for the Facebook content for Defendant Infinity Lounge at all times relevant to Plaintiff's Complaint. I have been advised by Third-Party Defendant Mayan Mobile Marketing's representative that Javier Martinez is the owner/operator of Moregraphix. I have been unable to locate Moregraphix as an entity registered with the State of New Jersey, but would like to add both of these parties. I have conferred with Plaintiff's counsel, and he consents to adding the additional parties and to the below discovery schedule:

1. Defendant Infinity Lounge is to file an Amended Third-Party Complaint naming as Third-Party Defendants Javier Martinez and Moregraphix within 10 days from the date that this proposed Order is entered;
2. Fact and party depositions completed by August 2, 2021;
3. Expert reports served by October 1, 2021;
4. Rebuttal reports served by November 1, 2021;
5. Expert depositions completed by December 15, 2021;
6. The June 16, 2021 status conference is rescheduled to_____.

Kindly enter this as a scheduling Order if it meets Your Honor's approval.

Thank you for the Court's consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'H. Benjamin Sharlin'.

H. Benjamin Sharlin, Esquire

HBS/ec

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It is so Ordered this ____day of June 2021.

Honorable Michael A. Hammer, U.S.M.J.

- c. All parties via efile and regular mail